

EXHIBIT D

Re: Cosby v. Rodriguez-Discovery Extension & Deposition Date

Hilary Jabs <hjabs@borkanscahill.com>

Mon 10/23/2023 2:36 PM

To: Sheila A Bedi <sheila.bedi@law.northwestern.edu>

Cc: Graham Miller <gmiller@borkanscahill.com>; hakeemmuhammad@peopleslawoffice.com
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Ben Elson <ben@peopleslawoffice.com>

Hi Sheila,

I hope you had a great weekend. We have still not received Plaintiff Cosby's Response to our Request to Produce. Unfortunately, we will need to reschedule Mr. Cosby's deposition set for October 25 until we receive all discovery responses and documents with time for us to review the same. We will be sending a 37.2 letter detailing the outstanding discovery issues later this week and would then like to schedule a 37.2 conference with you to resolve the pending issues.

Kindly,

**BORKAN
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From: Hilary Jabs <hjabs@borkanscahill.com>

Sent: Wednesday, August 30, 2023 11:06 AM

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Ms. Bedi,

Your request for a second discovery extension to September 15, 2023 is agreed. We assume if we were to need an extension in the future, you would extend the same professional courtesy. We are available on October 25, 2023 for Mr. Cosby's deposition. We will issue an amended notice accordingly.

Hilary L. Jabs